

1 Your Name: Louise Vaughn
2 Address: 4800 3rd St SF CA
3 Phone Number: (415) 970-1065
4 Fax Number:
5 E-mail Address:
6 Pro Se Plaintiff
7
8

FILED
2015 DEC 10 PM 3:09
SUSAN Y. SOONG
CLERK, US DISTRICT COURT
NO. DIST. OF CA.
[Handwritten signature]

EDL

United States District Court
Northern District of California

11 Louise Vaughn

CV Case Number: 15 5649

13 Plaintiff(s),

14 vs.

15 Sotheby's International Realty

COMPLAINT

DEMAND FOR JURY TRIAL

Yes No

19 Defendant(s).

21 1. Parties in this Complaint

22 a. Plaintiff(s). Write your name, address, and phone number. If there are other
23 plaintiffs, use more pages to include their names, addresses, and phone numbers.

24 Name: Louise Vaughn

25 Address: 4800 Third St. #202

26 San Francisco, CA 94124

27 Phone number: (415) 970-1065

28

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1 b. **Defendant(s).** Write the full name and address of every defendant. If the defendant is
2 a corporation, write the state where it is incorporated and the state where it has its main place of
3 business. Use more pages if you need to.

4 **Defendant 1:**

5 Name: Sotheby's International Realty
6 Address: 117 Greenwich St,
7 San Francisco, CA 94111

8 **Defendant 2:**

9 Name: _____
10 Address: _____
11 _____

12 **Defendant 3:**

13 Name: _____
14 Address: _____
15 _____

16 **Defendant 4:**

17 Name: _____
18 Address: _____
19 _____

20 **2. Jurisdiction**

21 Usually, only two types of cases can be filed in federal court: cases involving "federal
22 questions" and cases involving "diversity of citizenship." Check at least one box.

23 My case belongs in federal court under federal question jurisdiction because it is
24 about federal law(s) or right(s).

25 Which law(s) or right(s) are involved? Fair Housing Act, Title VIII
26 of the Civil Rights Act of 1968 (42 U.S.C. 3601)

27 My case belongs in federal court under diversity jurisdiction because none of the plaintiffs
28 live in the same state as any of the defendants AND the amount of damages is more than \$75,000.

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1 **3. Venue**

2 *This Court can hear cases arising out of Alameda, Contra Costa, Del Norte, Humboldt,*
3 *Lake, Marin, Mendocino, Monterey, Napa, San Benito, Santa Clara, Santa Cruz, San Francisco,*
4 *San Mateo, and Sonoma counties. This is the right court to file your lawsuit if 1) All defendants*
5 *live in California AND at least one of the defendants lives in this district; OR 2) A substantial*
6 *part of the events you are suing about happened in this district; OR 3) A substantial part of the*
7 *property that you are suing about is located in this district; OR 4) You are suing the U.S.*
8 *government or a federal agency or official in their official capacities and you live in this district.*
9 *Explain why this district court is the proper location to file your lawsuit.*

10 Venue is appropriate in this Court because The incident occurred
11 in San Francisco

13 **4. Intradistrict Assignment**

14 *There are three divisions of this Court: San Francisco/Oakland, San Jose, and Eureka.*
15 *The San Francisco/Oakland division covers Alameda, Contra Costa, Marin, Napa, San*
16 *Francisco, San Mateo, and Sonoma counties. The San Jose division covers Monterey, San*
17 *Benito, Santa Clara, Santa Cruz counties. The Eureka division covers Del Norte, Humboldt,*
18 *Lake, Mendocino counties, only if all parties consent to a magistrate judge. Explain which*
19 *division your case should be assigned.*

20 This lawsuit should be assigned to [Select one: San Francisco/Oakland, San Jose, OR
21 Eureka] Division of this Court because _____

22 San Francisco

24 **5. Statement of Facts and Claims**

25 *Write a short and simple description of the facts of your case. Include WHERE and*
26 *WHEN the events happened, WHO was involved, WHAT role each defendant played, and HOW*
27 *you were harmed. If you know which laws or rights the defendant violated, you can include them,*
28 *but you do not need to make legal arguments. Put each fact or claim into a separate, numbered*

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1 paragraph, starting with 5a, 5b, and so on. Attach additional sheets of paper as necessary. You
 2 may attach documents that support your claims to the end of this Complaint as exhibits. Explain
 3 what each exhibit is, when and how you got it, and how it supports your claims. Attaching a
 4 document to your Complaint does not necessarily mean that it will be accepted as evidence.

5 SA, As A Protected Class African American and
 6 Christian, between the the open of the housing site
 7 at 4800 Third Street San Francisco. I was denied
 8 the opportunity along with my daughter (Teresa Warren)
 9 to submit an application, By Linda Harrison I viewed
 10 the Site on a Sunday after Church when the
 11 open house was opened to the public, at the time
 12 it was unoccupied I believe it was sometime
 13 in 2010 or 2011. I call a few days after viewing them,
 14 Linda Harrison was the person I ~~speak~~ spoke with.
 15 I told her I would love to have a unit there
 16 to be near my church on Oakdale Ave, and that
 17 I was a senior and would like to know how to
 18 qualify? She (Miss Harrison) said "I would have to
 19 to make \$96,000^{per yr} to qualify, which meant I could not
 20 qualify in my mind.

21
 22 5B, Linda Harrison's, false information was an
 23 outrageous error that caused my family greatly harm
 24 and almost achieved her goal of preventing us
 25 from being a part of the community. A community where
 26 before the Civil Rights Act of 1968 was the only area
 27 African ^{Americans} could freely rent or purchase into, because of
 28 the overt effort of Redlining by Realty Company Banks

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1 SC. The Hurt and pain caused by such mean and cruel
 2 rejection is inconcievable when there was no doubt
 3 in my mind after all that's changed for so many
 4 discrimination has become the main focus on African American
 5 to achieve the gentification in areas where we once
 6 could have a small economy. And the hurt and pain is
 7 more severe when people who benifited by the blood
 8 shed of so many before us are many times heads
 9 that effort. I continued to search for affordable housing
 10 year after year because of what she (Linda Harrison)
 11 had done to us. But for some reason I called
 12 (Linda Harrison) again. She told me again "I needed to
 13 make \$96,000 per yr. to qualify"
 14 But my youngest daughter (Terri) had came from an
 15 appointment and heard the conversation we were having
 16 (Miss Harrison & Myself) She (Terri) said "I can't believe
 17 anyone making \$96,000 a year would want to live there."
 18 I called again and finally spoke with (Michael Simmons)
 19 He said my daughter could qualify with about
 20 \$30,000 and he would get us in^{PERSON} he was nice and
 21 respectful and connected me with the right to get
 22 our application started. I talked with him on
 23 December 18th or so 2014, at that time there were only
 24 about 3 units left out of the 18 originals and no
 25 parking space were available. I was not allowed to
 26 apply earlier because of Linda Harrison an agent
 27 of Sotheby's International Realty.

28

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1 **6. Demand for Relief**

2 State what you want the Court to do for you. For example, depending on which claims
3 you raise, it may be appropriate to ask the Court to award you money or order the defendant to
4 do something or stop doing something. If you are asking for money, you can say how much you
5 are asking for and why you should get that amount.

6 My family and myself should be compensated for
7 few punitive damages from Sotheby's International Realty
8 because (Linda Harrison) was there agent and
9 Somehow they overlooked her action. That caused great
10 pain and suffering. The stress of representing
11 myself in this action is a hardship who was only
12 looking for a place to live near my church, and was
13 deceived for almost 4 years. (2) a parking space and
14 12th in line for me or a family member if any quit
15 vacates.

16 **7. Demand for Jury Trial**

17 Check this box if you want your case to be decided by a jury, instead of a judge.

18 Plaintiff demands a jury trial on all issues.

19
20 All plaintiffs must sign, date, and print their names at the end of the Complaint. Attach
21 another page if you need to.

22
23 Respectfully submitted,

24
25 Date: 12/10/2015 Sign Name:

Louise Vaughn
Louise Vaughn

26
27 Print Name:

28
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